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*Attorneys for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA )  
MAPLEY, )  
Plaintiffs, ) Case No. CV-20-52-BLG-SPW  
vs. )  
WATCHTOWER BIBLE AND TRACT )  
SOCIETY OF NEW YORK, INC., )  
WATCH TOWER BIBLE AND TRACT )  
SOCIETY OF PENNSYLVANIA, and )  
BRUCE MAPLEY SR., )  
Defendants, )  
WATCHTOWER BIBLE AND TRACT )  
SOCIETY OF NEW YORK, INC., )  
Cross Claimant, )  
BRUCE MAPLEY, SR., )  
Cross Defendant. )

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Plaintiffs, by and through undersigned counsel, and pursuant to 28 U.S.C. § 1927 and the Court's inherent authority to sanction lawyers who abuse the judicial process, hereby move for sanctions to be imposed on Defendant Watch Tower Bible & Tract Society of Pennsylvania's attorneys, Philip Brumley, Esq., and Joel Taylor, for knowingly:

- Making and perpetuating false statements with the hope that they would be relied on by the Court to dismiss Plaintiffs' case; and
- Unreasonably and vexatiously multiplying these proceedings for the purpose of obstructing Plaintiffs' claims.

A supporting brief is being filed contemporaneously herewith.

Counsel for Defendants were contacted regarding this Motion and stated that they oppose it.

DATED 3<sup>rd</sup> day of December, 2021.

MEYER, SHAFFER & STEPANS PLLP

By: /s/ Ryan Shaffer

Ryan R. Shaffer

MEYER, SHAFFER & STEPANS PLLP

*Attorneys for Plaintiffs*

Plaintiffs' Motion for Sanctions

*Caekaert and Mapley v. Watchtower Bible Tract of New York, Inc., et. al.*

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**CERTIFICATE OF SERVICE**

Pursuant to Local Rule 1.4, this document has been served on all parties via electronic service through the Court's Case Management/Electronic Case Filing (CM/ECF) system.

By: /s/ Ryan Shaffer

Ryan R. Shaffer  
MEYER, SHAFFER & STEPANS PLLP

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